

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

FARIDA B. RAHMAN,
Plaintiff,

V.

POSTER TOWNSHIP
Defendant

CIVIL ACTION
JURY TRIAL DEMANDED

3:24-cv-1615

TO: THE HONORABLE JUDGES OF THE UNITED
STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA.

FILED
SCRANTON

SEP 24 2024

PER DJ
DEPUTY CLERK

ON NOTICE TO:
Poster Township
1000 Wyoming Avenue
Freeland, PA 18824

PLEASE TAKE NOTICE that the Plaintiff, Farida B. Rahman (herein Plaintiff) hereby files this action to the Federal Court in civil action for violation of the Plaintiff's rights Under 42 U.S. Code § 1983 and Negligence.

with full reservation to seek justice.

In support of her Complaint, the Plaintiff respectfully submit as follows:

1. Defendant always used state officials to help him win cases for him. The Defendant is liable under 42 U.S. Code § 1983, and negligence, because his conduct is so closely related to governmental

Defendant always used state officials to help him win cases for him. The Defendant is liable under 42 U.S. Code §1983 and negligence, because his conduct is so closely related to governmental conduct that it can be fairly viewed as a conduct of the state itself. The Defendant was acting of "Under color of state law" deprived my rights secured by the United States Constitution. The Defendant acted with ^{the} help of or in connect with state officials William H. Amesburg J., Lesa S. Gielb J., Thomas F. Burke J., Richard M. Hughes J., Gartley Polachek J., Fred A. Pierantoni J. See at McKersport Hospital V. Accreditation Council for graduate Medical Ed., 24 F.3d 519, 524 (3rd Cir. 1994). In Adickes v. S.H. Kress Co. 398 U.S. 144, 90 S. Ct. 1598, 26 L. Ed 2d 142 (1970), the court held that a conspiracy between a private party and a state official to engage in unlawful discrimination constituted action "Under Color" of law purpose to the statute. Id at 152 90 S. Ct at 1606. Similarly, in Lugar a private party's prejudgment attachment of another party's property pursuant to a state statute, constituted state action under section 1983. see at Lugar, 457 U.S. at 941-42, 102 S. Ct. at 2756.